

**SCURA, WIGFIELD, HEYER,
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

GEORGE MORALES, JR.,

Debtor.

Case No. 24-16570-VFP

Chapter 13

Judge: Hon. Vincent F. Papalia

Hearing Date: October 17, 2024, 10:00am

**NOTICE OF MOTION FOR AN ORDER AUTHORIZING AND
APPROVING: (I) THE SALE OF REAL PROPERTY; (II) PAYMENT OF
PROFESSIONAL FEES FROM SALE PROCEEDS; (III) WAIVING THE
FOURTEEN-DAY STAY PURSUANT TO FED. R. BANKR. P. 6004(h); AND
(IV) GRANTING OTHER AND RELATED RELIEF**

PLEASE TAKE NOTICE that George Morales, Jr. (the “Debtor”) will move before the United States Bankruptcy Court Judge Vincent F. Papalia on October 17, 2024, at 10:00 a.m., or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, for authorizing the sale of real property (the “Sale”) known as Boonstra Drive, Wayne, NJ 07470, and

PLEASE TAKE FURTHER NOTICE that in support of the motion, the undersigned will rely on the certification of George Morales, Jr., Debtor, and Giovanna Meli, Realtor, submitted herein; and

PLEASE TAKE FURTHER NOTICE that any answering papers or objections to the debtors’ motion must be filed and served at least seven (7) days before the return date of this

motion. If you wish to object to this motion, you must file responding papers stating with particularity the basis of your objection to the motion. All such responsive papers must be filed with the Clerk of the Bankruptcy Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey, and served simultaneously upon, David L. Stevens, Esq. as counsel for the debtors, at 1599 Hamburg Turnpike, Wayne, New Jersey; and

PLEASE TAKE FURTHER NOTICE that oral argument is only requested if the motion is contested or so directed by the Court; and

Respectfully submitted,

**SCURA, WIGFIELD, HEYER,
STEVENS & CAMMAROTA, LLP**
Attorneys for Debtor

Dated: October 7, 2024

/s/ David L. Stevens
David L. Stevens